The Ecology Consultancy

Pope's Road, Brixton / Preliminary Ecological Appraisal / Report for Trium Environmental Consulting LLP

Pope’s Road, Brixton

Preliminary Ecological Appraisal

Report for Trium Environmental Consulting LLP (on behalf of AG Hondo Pope’s Road BV)

Job Number	8976			
Author	John Myerscough BSc (Hons) MSc			
Version	**Checked by**	**Approved by**	**Date**	**Type**
5.0	Natalie Hughes BSc (Hons) ACIEEM	Sasha Dodsworth BSc MSc MCIEEM	18/03/2020	Final

The Ecology Consultancy, Tempus Warf, 33a Bermondsey Wall West, London, SE17 2PX
T. 01273 813739 **E**. enquiries@ecologyconsultancy.co.uk **W**. www.ecologyconsultancy.co.uk

Pope's Road, Brixton / Preliminary Ecological Appraisal / Report for Trium Environmental Consulting LLP

Contents

Summary of key issues

The Ecology Consultancy was commissioned to carry out a Preliminary Ecological Appraisal (PEA) comprising a Phase 1 habitat survey and protected species assessment of the proposed development known as the Pope’s Road, Brixton. The main findings are as follows:

- The site does not form part of any statutory or non-statutory nature conservation site.
- The site is comprised of a single building and associated hardstanding, with a small area of introduced shrub immediately adjacent the north west of the site. All habitats are of value at the site scale only.
- **Breeding birds –** The buildings on site and shrub immediately adjacent the site have the potential to support widespread breeding birds. Where these features will be affected by works, they should be removed outside of the nesting bird season (March to August inclusive). Where this is not possible, a nesting bird check must be undertaken prior to clearance, as detailed in Section 4 of this report.
- Recommendations to enhance the biodiversity value of the site in accordance with national and local planning policies comprise the inclusion of biodiverse roofs and wildlife planting.

1 Introduction

BACKGROUND TO COMMISSION

1.1 The Ecology Consultancy was commissioned by Trium Environmental Consulting (on behalf of AG Hondo Pope's Road BV) in September 2019 to carry out a Preliminary Ecological Appraisal (PEA) of the proposed development site, for a scheme known as Pope's Road, Brixton, London Borough of Lambeth (hereafter referred to as the site).

SCOPE OF THE REPORT

1.2 The aim of this appraisal is to provide baseline ecological information about the site. This has been used to identify any potential ecological constraints associated with the proposed development and/or to identify the need for any additional survey work to further evaluate any potential impact that may risk contravention of legislation or policy relating to protected species and nature conservation. Where necessary, avoidance, mitigation/compensation and/or enhancement measures have been recommended to ensure compliance.

1.3 This appraisal is based on the following information sources:

- A desk study of the site and land within a 1 kilometre (km) surrounding radius;
- A Phase 1 habitat survey (JNCC, 2010) of the site to identify and map the habitats identified as being present on-site;
- A protected species assessment of the site to identify features with the potential to support legally protected species; and
- An evaluation of the site's importance for nature conservation.

1.4 This appraisal has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2017) and as detailed in British Standard (BS) 42020:2013 *Biodiversity - Code of Practice for Biodiversity and Development* (BSI, 2013).

1.5 The survey and assessment were conducted, and this report has been written, by John Myerscough BSc (Hons) MSc, an Ecologist with over three years' experience who is competent in carrying out Phase 1 habitat surveys and protected species assessments.

SITE CONTEXT AND STATUS

1.6 The site is located approximately 60 metres (m) to the east of Brixton railway station, within the London Borough of Lambeth. It is approximately 0.26 hectares (ha) in size and is also situated to the north east of Brixton London Underground Station. The Ordnance Survey National Grid reference for the centre of the site is TQ 31241 75463. The site is located within a predominantly commercial retail setting, including the Brixton Recreation Centre, Brixton Village Market, restaurants and bars; residential properties are also located within the surrounding context, towards the northern, north-eastern and southern areas of the site.

1.7 The site comprises a funnel shaped parcel of land situated between two large railway viaducts. The site is bound by Pope's Road to the west, at its widest point, and Valentia Place to the east, at its narrowest point. The site comprises a single storey building currently in use as a retail store.

1.8 The site does not form part of any statutory or non-statutory designated nature conservation site. The Loughborough Park Site of Local Importance for Nature Conservation (SLINC) is located approximately 400m to the east of the site and the Rush Common and Raleigh Gardens SLINC is located approximately 550m to the south of the site. The site has no connectivity to these SLINCs and other green spaces due to the presence of large commercial and residential developments, unvegetated railway lines, and main roads between the SLINCs and the site, and the lack of green space within the immediate vicinity of the site.

DEVELOPMENT PROPOSALS

1.9 Demolition of the existing building and erection of a part G + 19, part G + 8 storey building comprising flexible A1/A3/B1/D1/D2 uses at basement, ground and first floor, with restaurant (A3) use on floor 8 and B1 accommodation on floors 2 to 19, with plant enclosures at roof level, and associated cycle parking, servicing and all necessary enabling works.

RELEVANT LEGISLATION AND PLANNING POLICY

1.10 The following key pieces of nature conservation legislation are relevant to this appraisal. A more detailed description of legislation is provided in Appendix 4:

- The Conservation of Habitats and Species Regulations 2017 (as amended) (commonly referred to as the Habitats Regulations);
- Wildlife and Countryside Act 1981 (as amended); and,

- Natural Environment and Rural Communities Act 2006.

1.11 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government (MHCLG, 2019) requires local authorities to avoid and minimise impacts on biodiversity and to provide net gains in biodiversity when taking planning decisions.

1.12 The London Plan: Spatial Strategy for Greater London (GLA, 2016) deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the Mayor's Biodiversity Strategy (GLA, 2002), and urban greening to mitigate the effects of climate change. The intend to Publish version of the new London Plan (GLA, 2019) places greater emphasis on green infrastructure and proposes that developments should incorporate green infrastructure. Policy G5 encourages Local Boroughs to develop their own 'Urban Greening Factor[1]' to identify the appropriate target for urban greening, based on the proportion of surface cover that contributes to ecosystem services. In the interim the target score is 0.4 for residential developments and 0.3 for commercial developments. Policy G6 states that 'development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain'.

1.13 Other planning policies at the local level which are of relevance to the proposed development include the Lambeth Local Plan (2015), the Draft Revised Lambeth Local Plan (2020), and the Lambeth Biodiversity Action Plan (2019). Further information is provided in Appendix 4.

[1] https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-8-green-infrastructure-and-natural-environment/policy-g5-urban

2 Methodology

DESK STUDY

2.1 The following data sources were reviewed to provide information on the location of statutory designated sites[2], non-statutory designated sites[3], legally protected species[4], Species and Habitats of Principal Importance[5], and other notable species[6] and notable habitats[7] that have been recorded within a 1km radius of the site:

- Greenspace Information for Greater London (GiGL), the local Biological Records Centre, principally for species records and information on non-statutory sites;
- MAGIC (http://www.magic.gov.uk/) - the Government's on-line mapping service for geographical information about the natural environment; and
- Ordnance Survey mapping and publicly available aerial photography.

HABITAT SURVEY

2.2 A habitat survey of the site was carried out on 07 October 2019 in clear, dry conditions. It covered the entire site, including boundary features. Habitats were described and mapped following standard Phase 1 habitat survey methodology (JNCC, 2010). Habitats were marked on a paper base map and subsequently digitised using ESRI ArcGIS software. Habitats were also assessed against descriptions of Habitat of Principal Importance, as set out by the JNCC (BRIG, 2008)[8].

2.3 Records for dominant and notable plants are provided, as are incidental records of birds and other fauna noted during the habitat survey.

---

2 **Statutory designations** include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR).

3 **Non-statutory sites** are designated by local authorities (e.g. Sites of Importance for Nature Conservation or Local Wildlife Sites).

4 **Legally protected species** include those listed in Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981; Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended); or in the Protection of Badgers Act 1992 (as amended).

5 **Species of Principal Importance** are those listed on Section 41 of the Natural Environment and Rural Communities Act, 2006.

6 **Notable species** include Species of Principal Importance under the Natural Environment and Rural Communities Act 2006; Local Biodiversity Action Plan (LBAP) species; Birds of Conservation Concern (Eaton *et al*., 2015); and/or Red Data Book/nationally notable species (JNCC, undated).

7 **Notable habitats** include Habitats of Principal Importance under the Natural Environment and Rural Communities Act, 2006; those included in an LBAP; Ancient Woodland Inventory sites; and Important Hedgerows as defined by the Hedgerow Regulations 1997.

8 Data required to confirm that certain habitats (including rivers and ponds) meet criteria for Habitats of Principle Importance is beyond that obtained during a Phase 1 habitat survey. In these cases the potential for such habitats to meet relevant criteria is noted but further surveys to confirm this assessment may be recommended

2.4 Common names are used where widely accepted for amphibians, birds, fish, mammals, reptiles and vascular plants. Scientific names are provided for other groups but at first mention only if there is also an accepted common name.

2.5 The site was also surveyed for the presence of invasive plant species as defined by Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). However, detailed mapping of such species is beyond the scope of this commission and the locations on habitat plan are indicative only.

2.6 Target notes are used to provide information on specific features of ecological interest or habitat features that were too small to be mapped.

PROTECTED AND NOTABLE SPECIES ASSESSMENT

2.7 The suitability of the site for legally protected species has been assessed on the basis of relevant desk study records[9] combined with field observations from the habitat survey. The likely value of habitat for protected species occurrence has been ranked on a scale from 'negligible' to 'present' as described in Table 2.1.

2.8 The assessment of habitat suitability for protected or notable species is based on professional judgement drawing on experience of carrying out surveys of a large number of urban and rural sites and best practice survey guidance on identifying field signs which includes that for the following species: badger (e.g. Roper, 2010); bats (Collins (ed.), 2016); and great crested newt (Langton et al., 2001).

Table 2.1: Protected species assessment categories

Category	Description
Present	Presence confirmed from the current survey or by recent, confirmed records.
High	Habitat present provides all of the known key requirements for a given species/species group. Local records are provided by desk study. The site is within or close to a national or regional stronghold for a particular species. Good quality surrounding habitat and good connectivity.
Moderate	Habitat present provides all of the known key requirements for a given species/species group. Several desk study records and/or site within national distribution and with suitable surrounding habitat. Factors limiting the likelihood of occurrence may include small habitat area, barriers to movement and disturbance.
Low	Habitat present is of relatively poor quality for a given species/species group. Few or no desk study records. However, presence cannot be discounted on the basis of national distribution, nature of surrounding habitats or habitat fragmentation.

9 Primarily dependent on the age of the records, distance from the site and types of habitats at the site.

Table 2.1: Protected species assessment categories

Category	Description
Negligible	Habitat is either absent or of very poor quality for a particular species or species group. There were no desk study records. Surrounding habitat unlikely to support wider populations of a species/species group. The site may also be outside or peripheral to known national range for a species.

2.9 The findings of this assessment establish the need for protected species surveys that are required to achieve compliance with the relevant legislation. Surveys are commonly required for widespread species such as bats, great crested newt, reptiles and badger, but may be necessary for other species if suitable habitat is present.

2.10 Surveys may be required where a site is judged to be of low suitability for a particular species/species group. However, in some cases there may be opportunities to comply with legislation, without further survey, through precautionary measures that would be implemented prior to and during construction.

SITE EVALUATION

2.11 The site's ecological value has been evaluated broadly in line with guidance issued by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018), which ranks the nature conservation value of a site according to a geographic scale of reference: international, national, regional, county/metropolitan, district/borough, local/parish or of value at the site scale. In evaluating the nature conservation value of the site, the following factors have been considered: nature conservation designations; species/habitat rarity; naturalness; fragility and connectivity to other habitats.

DATA VALIDITY AND LIMITATIONS

2.12 Every effort has been made to provide a comprehensive description of the site; however, the following limitations apply to this assessment.:

- The protected species assessment provides a preliminary view of the likelihood of protected species occurring on the site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if, on the basis of the preliminary assessment or during subsequent surveys, it is considered reasonably likely that protected species may be present.
- The ecological evaluation is preliminary and may change subject to the findings of further ecological surveys (should these be required).

- Even where data for a particular species group is provided in the desk study, a lack of records for a defined geographical area does not necessarily mean that there is a lack of ecological interest, the area may simply be under-recorded.
- Where only four figure grid references are provided for protected species by third parties, the precise location of species records can be difficult to determine, and they could potentially be present anywhere within the given 1km x 1km square. Equally six figure grid references may be accurate to the nearest 100m only.
- The Phase 1 habitat survey does not constitute a full botanical survey or provide accurate mapping of invasive plant species.
- Ecological survey data is typically valid for two years unless otherwise specified.

2.13 Despite these limitations, it is considered that this report accurately reflects the habitats present, their biodiversity values and the potential of the site to support protected and notable species.

3 Results

DESIGNATED SITES

Statutory Designated Nature Conservation Sites

3.1 The site is not subject to any statutory nature conservation designations. There are no European or national statutory sites located within a 2km radius of the site.

Non-Statutory Designated Nature Conservation sites

3.2 The site is not subject to any non-statutory nature conservation designations. Seven non-statutory sites designated as Sites of Importance for Nature Conservation (SINC) are present within a 1km radius of the site (see Table 3.1).

Table 3.1: Non-Statutory Designated Sites

Site Name	Distance from site and orientation	Reason for Designation
Site of Borough Importance for Nature Conservation		
Brockwell Park	950m south	Large open space combining a variety of recreational facilities with large areas of open parkland, woodland, and ponds. Wetland features include a series of small ponds linked by the River Effra on the western boundary of the park. A large area of rough meadow grassland is present, as well as several mature, native trees.
Ruskin Park	1000m east	Rolling park, with a pond as the central feature. Mature trees and dense introduced shrubberies are present circling the pond which provide nesting habitat for common birds.
Site of Local Importance for Nature Conservation		
Loughborough Park	400m east	Parkland with a large number of scattered trees and several planted shrubberies. The trees and shrubs provide good habitat for birds, including great spotted woodpecker.

Table 3.1: Non-Statutory Designated Sites

Site Name	Distance from site and orientation	Reason for Designation
Rush Common and Raleigh Gardens	550m south	A near continuous linear park along the eastern side of Brixton Hill Road. Mainly consists of amenity grassland with scattered mature trees, including, London plane, lime, ash, false acacia, and horse chestnut.
Hill Mead Schools Nature Garden	600m south-east	A small nature garden within the Moorlands Estate in central Brixton. Contains a pond supporting frogs and aquatic vegetation, and some planted hedgerows of oak, hazel, hawthorn, and Norway maple.
Stockwell Park Estate Fish Pond	620m north-west	A small landscaped pond within the Stockwell Park Estate. The pond has shallow, shelving edges with introduced marginal vegetation including, yellow iris, booklime, and water mint. The grassy edges of the pond have been planted with crack willow and one mature crack willow tree is present.
Elam Street Open Space	930m north-east	A small open space with extensive areas of semi-improved neutral grasslands. The grassland combined with large patches of climbers such as honeysuckle, bindweeds, and ruderals support a variety of invertebrates. Mature trees around the edge support common breeding birds.

PHASE 1 HABITAT SURVEY

Overview

3.3 The site was dominated by a single building in use as commercial businesses and a car park. The roof of the car park had been temporarily in use as a pop-up bar with late night opening and was therefore subject to high levels of night-time disturbance through noise and lighting. The site was bordered to the north and south by elevated railway lines, which are supported by railway arches, and the building extended under the railway arch in the north west corner of the site. The site was in constant use by cars and pedestrians and was subject to high levels of noise and lighting through the bar and adjacent railways. Hardstanding footpaths surrounded the site and ran in between the building and the elevated railway lines/arches, and a small area of introduced shrub was located adjacent to the building, immediately to the north west of the site. Although the area of introduced scrub was located outside of the site boundary, it had the potential to be impacted by the proposed development, and so is considered as part of this assessment.

3.4 Phase 1 habitat types are mapped in Appendix 1, Figure 1 and areas are given in Table 3.2. A description of dominant and notable species, and the composition of each habitat, is provided below.

Table 3.2: Habitat and Associated Areas within Proposed Site Boundary

Phase 1 Habitat	Extent
Buildings and hardstanding	2,769m^2

Habitat Description

Buildings and Hardstanding

3.5 The site was dominated by a single-storey building (B1). The building was in use as various retail and commercial uses at ground level, with elevated car parking provided on the roof of the building. The building had a flat, concrete roof had previously been used as a pop-up bar. The building was constructed from a mixture of brick and concrete, with solid brick walls on the northern and southern aspects. A concrete ramp was present at the eastern side of the building, leading from ground level to the roof of the building. The building was largely in a good condition throughout, with no gaps in the concrete or missing sections of bricks. Hardstanding paths ran along the north and south of the building, and small areas of buddleia were present growing in cracks in the hardstanding (Appendix 2, Photographs 1 to 3).

3.6 The site was bordered to the north and south by brick railway arches, which supported the elevated railway lines, some of which were in use as commercial spaces. Several of the arches were sealed with metal gates, and some were partially bricked over. The brickwork was largely in good condition, although there were places where bricks and mortar were missing. Several patches of buddleia were growing from cracks in the brickwork. The arches it was possible to access internally appeared to contain well-sealed brickwork, with no internal voids (Appendix 2, Photograph 4).

Introduced shrub

3.7 An area of introduced shrub was present immediately to the north west of the site boundary, bordering building B1. This was dominated by buddleia growing in cracks within the hardstanding path (Appendix 2, Photograph 5).

PROTECTED AND INVASIVE SPECIES ASSESSMENT

3.8 The potential for the site to support protected species has been assessed using criteria provided in Table 2.1, based on the results of the desk study and observations made during the site survey of habitats at the site. Other legally protected species are not referred to as it is considered that the site does not contain habitats that would be suitable to support them. The following species/species groups are potentially present at the site:

- Bats;
- Breeding birds; and,
- Invasive plant species.

3.9 The likelihood of these species being present within the site are evaluated in Table 3.3 below, based on the results of the desk study, observations made during the site survey and an assessment of the suitability of on-site and adjoining habitat.

Table 3.3: Protected and Invasive Species Assessment

Habitat/ species	Status [10, 11]	Likelihood of occurrence
Bats	HR WCA S5	**Negligible:** Building B1 on site and the railway arches adjacent the site had no features of potential to support roosting bats, such as roof voids, lifted/missing tiles, lead flashing, or soffit boards. The concrete and brickwork of B1 were well-sealed, and there were no internal cavities. The flat, concrete roof was in use as a car park and with no internal roof void. The brickwork of the railway arches was well-sealed with no separate cavities. The rooftop of building B1 had previously been in use as a bar and the site is located within a highly urbanised area with several other bars and clubs nearby with late night opening hours. The site is therefore subject to high levels of night time noise and lighting. The site is bound by largely unvegetated railway lines to the north and south, and busy roads. There is therefore no foraging habitat within the site or any connectivity to potential bat commuting/foraging habitat off-site. The desk study provided records for one species of bat within 1km of the site, common pipistrelle. The closest record to the site was located 300m south-west of the site in July 2011 and the most recent record was 700m north west of the site in September 2013. There is no connectivity between the site and these or any other suitable off-site habitat which could potentially be utilised as commuting routes for bats. **As there is a negligible potential of roosting bats on the site, they are not considered further in this report.**
Breeding birds	WCA S5	**Low:** The flat roof of building B1 was in constant use and provided limited potential to support common breeding birds, such as feral pigeon. The area of introduced shrub immediately adjacent the north of the site was limited in extent and provided limited potential to support low numbers of common breeding birds. The railway arches bordering the site contained several ledges which had limited potential to support feral pigeon. No bird species were recorded on site during the survey. The data search provided records for 14 bird species, including Species of Principal Importance and London BAP species. The habitats at the site were unlikely to support the majority of the species recorded in the data search, with the exception of house sparrow which occur in urban areas and could potentially use the shrub area adjacent the site. **There is a low potential for breeding birds to be present at the site and as such they are considered further in Section 4 of this report**.

10 The following abbreviations have been used to signify the legislation regarding different species: HR = Conservation of Habitats and Species Regulations 2017; WCA S1 = Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); WCA S5 = Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); WCA S9 = Schedule 9 of the Wildlife and Countryside Act 1981 (as amended); PBA = Protection of Badgers Act, 1992.

11 The following abbreviations have been used to signify the policy of conservation assessments applying to notable species: SPI = Species of Principal Importance under the NERC Act 2006; LBAP = Local Biodiversity Action Plan species; BoCC = Birds of Conservation Concern - amber list / red list (Eaton *et al*., 2015); and/or RD/NN = red data book/nationally notable species (JNCC, undated).

Table 3.3: Protected and Invasive Species Assessment

Habitat/ species	Status [10, 11]	Likelihood of occurrence
Invasive species	WCA S9	**Negligible:** There were no invasive species recorded on the site during the habitat survey, or in the areas of shrub located immediately adjacent to the north of the site. There are several desk study records for invasive species within 1km of the site, including Japanese knotweed, cotoneaster, and other species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). **There is a negligible potential for invasive species to be present on site, therefore they are not considered further in this report.**

NATURE CONSERVATION EVALUATION

3.10 The site is not subject to any nature conservation designations. The site consists of buildings and hardstanding and contains no areas which are Habitats of Principal Importance or London/Lambeth BAP habitats. The site is situated within a densely urban area surrounded by commercial properties, railways and roads. Overall, the habitats are considered to be of value at site level only.

3.11 The limited habitat on site and immediately off site was suitable to support low numbers of breeding birds. No other protected or notable species were considered likely to use the site.

4 Potential Impacts and Recommendations

4.1 This section summarises the potential impacts on habitats and notable species that may be present at this site.

4.2 The following key ecological issues have been identified:

- Habitat suitable for breeding birds is present – measures must be taken to avoid killing birds or destroying their nests; and
- A range of measures should be undertaken to satisfy the requirement for ecological enhancement included in planning policy.

CONSTRAINTS AND MITIGATION/COMPENSATION

Habitats

4.3 The habitats on site will be removed to enable the construction of the proposed development. However, these habitats are common and widespread in the locality, and no particular constraints have been identified in relation to the intrinsic value of the habitats present.

4.4 Working under the principle of 'net-gain' as supported by planning policy, the site should be enhanced through soft landscaping proposals including biodiverse green roofs and planting schemes of recognised value to wildlife.

Environmental best practice

4.5 Best environmental practice measures which should be implemented include:

- Adherence to best construction practice including CIRIA (Connolly and Charles, 2005).

Breeding birds

4.6 All wild birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended).

4.7 Where the proposed works require the removal of the building on site and introduced shrub immediately adjacent to the north west of the site with potential to support breeding birds, this should be carried out between September and February inclusive, to avoid any potential offences relating to breeding birds during their main bird breeding season (Newton *et al.*, 2011).

4.8 If site clearance during the breeding season is unavoidable, then potential nesting habitat must be inspected by a suitably qualified ecologist within 48 hours of the start of clearance to identify any active birds' nests. Should they be present, the nest and a suitable buffer of habitat around it must be retained until an ecologist has confirmed that the young have left the nest. If any nesting birds are found at any time during clearance works, works within the immediate surroundings of the nest must stop immediately and an ecologist consulted.

Other protected species

4.9 Works must stop immediately and advice sought from a suitably qualified ecologist in the unlikely event that any protected species are found during site clearance or construction.

OPPORTUNITIES FOR ECOLOGICAL ENHANCEMENT

4.10 Planning policy at the national and local level and strategic biodiversity partnerships encourage inclusion of ecological enhancements in development projects. Ecological enhancements can also contribute to green infrastructure and ecosystem services such as storm water attenuation and reducing the urban heat island effect. The following measures would be suitable for integration into the site's design.

Biodiverse roof

4.11 There is potential for the site to be enhanced through the inclusion of areas of biodiverse roof on the new building, in line with Lambeth Local Plan Policies EN1 and EN4 (London Borough of Lambeth Council, 2015 and 2020). To demonstrate the highest feasible and viable sustainability standards in-line with London Plan Policies (GLA, 2019) and the Lambeth Local Plan Policy EN4: *"All non-residential development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development."* (Lambeth Council, 2015 and 2020), it is recommended that the use of biodiverse roofs are considered as part of the evolving design of the proposed development. It is recommended that a specification for a biodiverse roof be drawn up by a company with a proven track record in delivering these features in London. Any biodiverse roof should support at least 25 plant species.

4.12 A biodiverse green roof would provide additional benefits such as protecting and prolonging the life of the roof membrane, reducing building energy use by insulating the building in winter and keeping it cooler in summer, providing a sustainable drainage system (SuDS) function by reducing storm water run-off from the roof, reducing the urban heat island effect and local air/noise pollution. Combining a biodiverse roof with photovoltaic (PV) panels (biosolar roof) would also provide further benefits, such as the cooling effect the vegetation has on the PV cells, increasing their productivity in hot weather, as well as resulting in a more efficient use of roof space.

4.13 The green roof should follow UK standards (GRO, 2014) and include additional habitat features such as deadwood and varying substrate depths. This will provide good habitat for a range of insects and birds including London and Lambeth BAP species.

Wildlife planting

4.14 Wildlife planting should be integral to the soft landscaping and should include native species and/or species of recognised wildlife value[12]. The use of nectar-rich and berry producing plants will attract a wider range of insects, birds and mammals. Where possible larger shrubs/trees should be under-planted to create greater structure and cover for wildlife. The use of block planting of single species should be avoided in favour of a higher diversity of plant types per square metre.

4.15 Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants with local provenance and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

[12] For example The Royal Horticultural Society (RHS) Perfect for Pollinators Scheme https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/encourage-wildlife-to-your-garden/plants-for-pollinators and the joint RHS/Wildlife Trust's Gardening With Wildlife In Mind Database http://www.joyofplants.com/wildlife/home.php

References

Biodiversity Reporting and Information Group (2008) *UK Biodiversity Action Plan Priority Habitat Descriptions*. JNCC. Peterborough.

British Standards Institution (2013) *Biodiversity. Code of practice for planning and development: 42020*. BSI, London.

CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd edition. The Bat Conservation Trust, London.

Connolly, S. & Charles, P. (2005) *Environmental good practice pocket book.* CIRIA, London.

Greater London Authority (GLA) (2019). *The London Plan: The Spatial Development Strategy for London (Intend to Publish Version). December 2019.* https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

Greater London Authority (GLA) (2016). *The London Plan: The Spatial Strategy for London (consolidated with alterations since 2011). March 2016.* https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan

Greater London Authority (GLA) (2002). *The Mayor's Biodiversity Strategy.* https://www.london.gov.uk/sites/default/files/biodiversity_strategy.pdf

JNCC (2010) *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council. Reprinted by Joint Nature Conservation Committee, Peterborough.

London Borough of Lambeth Council (2019). *Lambeth Biodiversity Action Plan 2019 – 2024.* London Borough of Lambeth Council. London

London Borough of Lambeth Council (2020) *Draft Revised Lambeth Local Plan* London Borough of Lambeth Council. London

London Borough of Lambeth Council (2015) *Lambeth Local Plan* London Borough of Lambeth Council. London.

MAGIC (2016) *Multi-Agency Geographic Information for the Countryside*. http://www.magic.gov.uk/

Ministry of Housing, Communities and Local Government (2019). *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government, London. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

Newton, J., Nicholson, B., Saunders, R., Willets, R. & Venables, R. (2011) *Working with wildlife: guidance for the construction industry* (2nd Ed.). CIRIA, London.

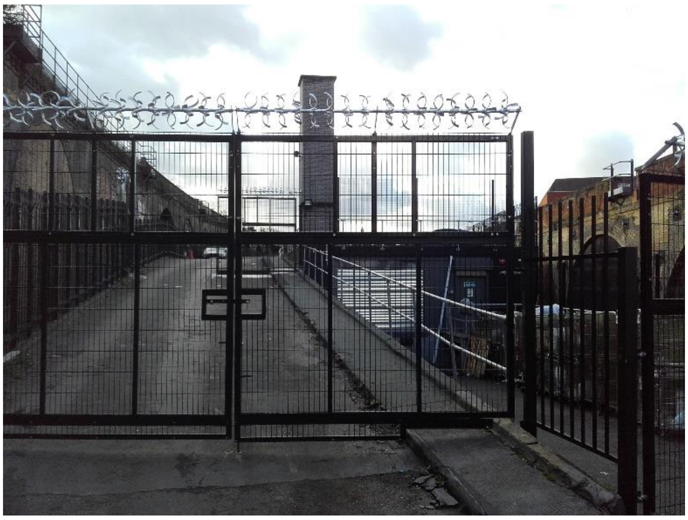
Stace, C.A. (2010) *New Flora of the British Isles* (3rd Ed.). Cambridge University Press, Cambridge.

Appendix 1: Habitat Map

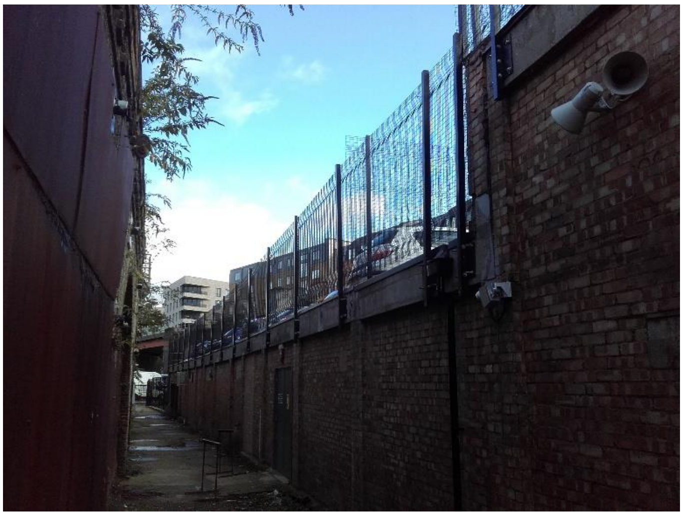
Figure 1: Habitat Survey Map

Appendix 2: Photographs

Photograph 1
Concrete ramp leading to flat roof of building B1, viewed from the east.



Photograph 2
North eastern section of building B1, with flat roof in use as a car park.



Photograph 3
Western aspect of building B1, fronting onto Pope’s Road.

Photograph 4
Railway arches to the south of building B1, partially sealed with brick walls.

Photograph 5
Area of buddleia to the north west of building B1, dominated by buddleia.

Appendix 3: Plant Species List

Plant Species List for Pope's Road Project, Brixton, compiled from Phase 1 habitat survey carried out on 07 October 2019.

Scientific nomenclature and common names for vascular plants follow Stace (2010) and Blockeel & Long (1998) for bryophyte species. Please note that this plant species list was generated as part of a Phase 1 habitat survey, does not constitute a full botanical survey and should be read in conjunction with the associated results section of this PEA.

Abundance was estimated using the DAFOR scale as follows:
D = dominant, A = abundant, F = frequent, O = occasional, R = rare, L = locally
c=clumped, e=edge only, g=garden origin, p=planted, y = young, s=seedling or sucker, t=tree, h=hedgerow, w=water

SCIENTIFIC NAME	COMMON NAME	ABUNDANCE	QUALIFIER
Acer pseudoplatanus	Sycamore	L	y
Agrostis capillaris	Common bent	L	e
Buddleia davidii	Buddleia	D	e
Erigeron canadensis	Canadian fleabane	L	e
Diplotaxis muralis	Annual wall-rocket	L	e
Mercurialis perennis	Dog's mercury	L	e
Taraxacum sp.	Dandelion	L	e

Appendix 4: Legislation and Planning Policy

Important notice: This section contains details of legislation and planning policy applicable in Britain only (i.e. not including the Isle of Man, Northern Ireland, the Republic of Ireland or the Channel Islands) and is provided for general guidance only. While every effort has been made to ensure accuracy, this section should not be relied upon as a definitive statement of the law.

A NATIONAL LEGISLATION AFFORDED TO SPECIES

The objective of the EC Habitats Directive[13] is to conserve the various species of plant and animal which are considered rare across Europe. The Directive is transposed into UK law by The Conservation of Habitats and Species Regulations 2017 (formerly The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)) and The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended).

The Wildlife and Countryside Act 1981 (as amended) is a key piece of national legislation which implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and implements the species protection obligations of Council Directive 2009/147/EC (formerly 79/409/EEC) on the Conservation of Wild Birds (EC Birds Directive) in Great Britain.

Since the passing of the Wildlife & Countryside Act 1981, various amendments have been made, details of which can be found on www.opsi.gov.uk. Key amendments have been made through the Countryside and Rights of Way (CRoW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991;
- Countryside and Rights of Way (CRoW) Act 2000;
- Natural Environment & Rural Communities (NERC) Act 2006;
- Protection of Badgers Act 1992:
- Wild Mammals (Protection) Act 1996.

Species and species groups that are protected or otherwise regulated under the aforementioned domestic and European legislation, and that are most likely to be affected by development activities, include herpetofauna (amphibians and reptiles), badger, bats, birds,

[13] Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

dormouse, invasive plant species, otter, plants, red squirrel, water vole and white clawed crayfish.

Explanatory notes relating to species protected under The Conservation of Habitats and Species Regulations 2017 (which includes smooth snake, sand lizard, great crested newt and natterjack toad), all bat species, otter, dormouse and some plant species) are given below. **These should be read in conjunction with the relevant species sections that follow.**

- In the Directive, the term ‘deliberate’ is interpreted as being somewhat wider than intentional and may be thought of as including an element of recklessness.
- The Conservation of Habitats and Species Regulations 2010 (as amended) does not define the act of ‘migration’ and therefore, as a precaution, it is recommended that short distance movement of animals for e.g. foraging, breeding or dispersal purposes are also considered.
- In order to obtain a European Protected Species Mitigation (EPSM) licence, the application must demonstrate that it meets all of the following three ‘tests’: i) the action(s) are necessary for the purpose of preserving public health or safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequence of primary importance for the environment; ii) that there is no satisfactory alternative and iii) that the action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the Wildlife and Countryside Act 1981 (as amended). Among other things, this makes it an offence to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built;
- Intentionally take or destroy an egg of any wild bird:
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.

Certain species of bird, for example the barn owl, black redstart, hobby, bittern and kingfisher receive additional special protection under Schedule 1 of the Act and Annex 1 of the European

Community Directive on the Conservation of Wild Birds (2009/147/EC). This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young;
- Intentional or reckless disturbance of dependent young of such a bird.

How is the legislation pertaining to birds liable to affect development works?

To avoid contravention of the Wildlife and Countryside Act 1981 (as amended), works should be planned to avoid the possibility of killing or injuring any wild bird, or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird breeding season which typically runs from March to August[14]. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Those species of bird listed on Schedule 1 are additionally protected against disturbance during the breeding season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

Invasive Plant Species

Certain species of plant, including Japanese knotweed *Fallopia japonica*, giant hogweed *Heracleum mantegazzianum* and Himalayan balsam *Impatiens glandulifera* are listed on Part II of Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) in respect to Section 14(2). Such species are generally non-natives whose establishment or spread in the wild may be detrimental to native wildlife. Inclusion on Part II of Schedule 9 therefore makes it an offence to plant or otherwise cause these species to grow in the wild.

How is the legislation pertaining to invasive plants liable to affect development works?

Although it is not an offence to have these plants on your land per se, it is an offence to cause these species to grow in the wild. Therefore, if they are present on site and development activities (for example movement of spoil, disposal of cut waste or vehicular movements) have the potential to cause the further spread of these species to new areas, it will be necessary to

[14] It should be noted that this is the main breeding period. Breeding activity may occur outwith this period (depending on the particular species and geographical location of the site) and thus due care and attention should be given when undertaking potentially disturbing works at any time of year.

ensure appropriate measures are in place to prevent this happening prior to the commencement of works.

Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to:

- Mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

B NATIONAL AND EUROPEAN LEGISLATION AFFORDED TO HABITATS

Statutory Designations: National

Nationally important areas of special scientific interest, by reason of their flora, fauna, or geological or physiographical features, are notified by the countryside agencies as statutory **Sites of Special Scientific Interest** (SSSIs) under the National Sites and Access to the Countryside Act 1949 and latterly the Wildlife & Countryside Act 1981 (as amended). As well as underpinning other national designations (such as **National Nature Reserves** which are declared by the countryside agencies under the same legislation), the system also provides statutory protection for terrestrial and coastal sites which are important within a European context (Natura 2000 network) and globally (such as Wetlands of International Importance). See subsequent sections for details of these designations. Improved provisions for the protection and management of SSSIs have been introduced by the Countryside and Rights of Way Act 2000 (in England and Wales).

The Wildlife & Countryside Act 1981 (as amended) also provides for the making of **Limestone Pavement Orders,** which prohibit the disturbance and removal of limestone from such designated areas, and the designation of **Marine Nature Reserves**, for which byelaws must be made to protect them.

Statutory Designations: International

Special Protection Areas (SPAs), together with **Special Areas of Conservation** (SACs) form the **Natura 2000** network. The Government is obliged to identify and classify SPAs under the EC Birds Directive (Council Directive 2009/147/EC (formerly 79/409/EEC)) on the Conservation of Wild Birds). SPAs are areas of the most important habitat for rare (listed on Annex I of the Directive) and migratory birds within the European Union. Protection afforded SPAs in terrestrial areas and territorial marine waters out to 12 nautical miles (nm) is given by The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SPAs in UK offshore waters (from 12-200 nm).

The Government is obliged to identify and designate SACs under the EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora). These are areas which have been identified as best representing the range and variety of habitats and (non-bird) species listed on Annexes I and II to the Directive within the European Union. SACs in terrestrial areas and territorial marine waters out to 12 nm are protected under The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SACs in UK offshore waters (from 12-200 nm).

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and wise use, in particular recognizing wetlands as ecosystems that are globally important for biodiversity conservation. Wetlands can include areas of marsh, fen, peatland or water and may be natural or artificial, permanent or temporary. Wetlands may also incorporate riparian and coastal zones adjacent to the wetlands. Ramsar sites are underpinned through prior notification as Sites of Special Scientific Interest (SSSIs) and as such receive statutory protection under the Wildlife & Countryside Act 1981 (as amended) with further protection provided by the Countryside and Rights of Way (CRoW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. This effectively extends the level of protection to that afforded to sites which have been designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs).

Statutory Designations: Local

Under the National Sites and Access to the Countryside Act 1949 **Local Nature Reserves** (LNRs) may be declared by local authorities after consultation with the relevant countryside agency. LNRs are declared for sites holding special wildlife or geological interest at a local level and are managed for nature conservation, and provide opportunities for research and education and enjoyment of nature.

Non-Statutory Designations

Areas considered to be of local conservation interest may be designated by local authorities as a **Wildlife Site**, under a variety of names such as **County Wildlife Sites** (CWS), **Listed Wildlife Sites** (LWS), **Local Nature Conservation Sites** (LNCS), **Sites of Biological Importance** (SBIs), **Sites of Importance for Nature Conservation** (SINCs), or **Sites of Nature Conservation Importance** (SNCIs). The criteria for designation may vary between counties.

Together with the statutory designations, these are defined in local and structure plans under the Town and Country Planning system and are a material consideration when planning applications are being determined. The level of protection afforded to these sites through local planning policies and development frameworks may vary between counties.

Regionally Important Geological and Geomorphological Sites (RIGS) are the most important places for geology and geomorphology outside land holding statutory designations such as SSSIs. Locally-developed criteria are used to select these sites, according to their value for education, scientific study, historical significance or aesthetic qualities. As with local Wildlife Sites, RIGS are a material consideration when planning applications are being determined.

C NATIONAL PLANNING POLICY

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) replaced Planning Policy Statement (PPS9) in April 2012 as the key national planning policy concerning nature conservation. The NPPF emphasises the need for suitable development. The Framework specifies the need for protection of designated sites and priority habitats and priority species. An emphasis is also made for the need for ecological networks via preservation, restoration and re-creation. The protection and recovery of priority species – that is those listed as UK Biodiversity Action Plan priority species – is also listed as a requirement of planning policy. In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from adverse harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and The Biodiversity Duty

The Natural Environment and Rural Communities (NERC) Act came into force on 1st October 2006. Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act (Section 42 in Wales) requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity.' They are referred to in this report as Species of Principal Importance and Habitats or Principal Importance. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

D REGIONAL PLANNING POLICY

The London Plan (2016): The Mayor's Spatial Strategy for Greater London

The 2016 London Plan includes all updates since its previous 2011 version and deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the Mayor's Biodiversity Strategy (GLA, 2002), and urban greening to mitigate the effects of climate change. Policies 5.10 – 'urban greening', and 7.19 – 'Biodiversity and access to nature', are relevant to the development proposal and are detailed below.

Climate change adaptation - Policy 5.10 Urban Greening

Strategic

A The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

B The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030, and a further five per cent by 2050.

Planning decisions

C Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

LDF preparation

D Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.

Climate change adaptation - Policy 5.11 Green roofs and development site environs

Planning decisions

A Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:

- a adaptation to climate change (ie aiding cooling)
- b sustainable urban drainage
- c mitigation of climate change (ie aiding energy efficiency)
- d enhancement of biodiversity
- e accessible roof space
- f improvements to appearance and resilience of the building
- g growing food.

LDF preparation

B Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.

Protecting London's open and natural environment - Policy 7.19 Biodiversity and access to nature

Strategic

A The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

B Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 2.14, 2.15, 2.16 and 2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25, 7.26 and 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning decisions

C Development Proposals should:

a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity

b. prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites

c. not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

D On Sites of Importance for Nature Conservation development proposals should:

a. give the highest protection to sites with existing or proposed international designations[1] (SACs, SPAs, Ramsar sites) and national designations[2] (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations[3]

b. give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance

d. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1 avoid adverse impact to the biodiversity interest

2 minimise impact and seek mitigation

3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

F In their LDFs, Boroughs should:

a. use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.

b. identify areas deficient in accessible wildlife sites and seek opportunities to address them

c. include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets

d. ensure sites of European or National Nature Conservation Importance are clearly identified.

e. identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

Connecting with London's Nature: The Mayor's Biodiversity Strategy

Connecting with London's Nature: The Mayor's Biodiversity Strategy (GLA, 2002) includes a number of policies and proposals for protecting green spaces and important species that are relevant to the site.

Proposal 3: Conserving species through the planning system states that:

''The Mayor will and boroughs should resist development that would have a significant adverse impact on the population or conservation status of protected species or priority species"

Proposal 6: Greening new developments states that:

"The Mayor will and boroughs should ensure that new development capitalises on opportunities to create, manage and enhance wildlife habitat and natural landscape. Priority

should be given to sites within or near to areas deficient in accessible wildlife sites, areas of regeneration, and adjacent to existing wildlife sites".

Living Roofs and Walls; Technical Report: Supporting London Plan Policy

A technical report (GLA, 2008) on living roofs and walls has been published to support The London Plan (GLA, 2016) and the new London BAP habitat – Built Structures. In outline, it includes the following key policies;

''The major will and boroughs should expect major developments to incorporate living roofs and walls where feasible and reflect this principle in LDF policies. It is expected that this will include roof and wall planting that delivers as many of these objectives as possible;

- Accessible roof space
- Adapting to and mitigating climate change
- Sustainable urban drainage
- Enhancing biodiversity
- Improved appearance

"Boroughs should also encourage the use of living in smaller developments and extensions where the opportunity arises''.

E LOCAL PLANNING POLICY

The following policies in The Lambeth Local Plan (LBL, 2015) are relevant to the site as shown below:

EN1 – Open space and biodiversity

- *Development proposals should:*
    - *Not result in loss, reduction or harm to nature conservation or biodiversity of open space without adequate mitigation or compensation measures appropriate to the nature conservation value of the assets involved.*
    - *Protect, enhance, create or manage nature conservation and biodiversity in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.*
    - *Where appropriate and feasible, ensure that development is designed to contribute to the creation or extension of green corridors to promote migration and protection of plants, animals and habitats of biodiversity importance.*

EN4 – Sustainable design and construction

- *Non-residential development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development.*

Q9 – Landscaping

- *Development will be supported where:*
  - *Creates new habitats/areas of nature conservation interest and biodiversity value; and*
  - *Maximised opportunities for greening, such as through planting of trees and other soft landscaping.*

The Ecology Consultancy

The Ecology Consultancy is part of the Temple Group.

Making places better for people and wildlife

London - Tempus Wharf, 33a Bermondsey Wall West, London, SE16 4TQ
T. 020 7378 1914 W. www.ecologyconsultancy.co.uk E. enquiries@ecologyconsultancy.co.uk

- **Sussex -** 3 Upper Stalls, Iford, Lewes, East Sussex BN7 3EJ **T.** 01273 813739
- **East Anglia -** 60 Thorpe Road, Norwich, Norfolk NR1 1RY **T.** 01603 628408
- **Midlands -** 1-2 Trent Park, Eastern Avenue, Lichfield, Staffordshire WS13 6RN **T.** 01543 229049
- **North -** The Paine Suite, Nostell Business Park, Doncaster Road, Wakefield, WF4 1AB **T.** 01924 921900
- **Devon -** 3 Drakes Cottages, Milton Combe, Yelverton, Devon, PL20 6HB **T.** 01822 855196